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DR. WILLIE W. HERENTON - Mayor
RICK MASSON - Chief Administrative Officer
DIVISION OF POLICE SERVICES
WALTER E. CREWS - Director
Police Operations

May 9, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Michael K. Powell, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Regarding: (URGENT) WT Docket Number 00-32

Sir:

As Director of Police Services for the City of Memphis, Tennessee, I am very concerned about the Federal Communications Commission's intention to auction 50 MHz of spectrum in the 4940-4990 MHz (4.9GHz) band, rather than allocating this critically needed spectrum to public safety for new broadband public safety applications.

The Memphis Police Department provides police services to the 650,100 plus citizens of Memphis in a 313 square mile area. The population in our city grows to over one million during weekdays and special events. Our current complement is 1,853 commissioned officers and 898 civilians. The Memphis Police Department responded to 868,238 calls for service in 2000 and we expect that number to increase to one million this year.

Our struggle to provide the increasing demands for police services will greatly depend on the technologies we can deploy and afford in the future. The advancements in technologies using broadband spectrum will require significantly wider dedicated bandwidths for public safety agencies than is currently allocated by the FCC. The ability of agencies, such as ours, to improve, afford and provide effective future wireless technologies will depend on this decision.

The Memphis Police Department's three-year short range and five-year long range technology plan includes extensive use of Wireless Local Area Networks (WLAN) using, preferably, broadband wireless technologies to deploy mobile offices, mobile data terminals, handheld computers, video cameras and other computerized peripherals and technologies. We plan to deploy applications that require large amounts of data and image files to be transmitted and received wirelessly. Some examples are: mobile crime mapping on the fly, inmate photos, wanted and missing person photos, streaming videos of crimes and crime scenes to officers in the field, wireless real time video and audio of high crime areas under surveillance, and wireless transmissions of crime incident reports. All these are necessary for a safer community and for a safer working environment for our officers.

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In fact, we currently deploy many of these applications. However, the limitations of how much data we can transmit and the speeds at which we can transmit is severely restricted because of current bandwidth constraints. We currently are deploying wireless technology limited to a bandwidth and speeds of 19.2 kbps (kilobits per second). This is slower and less bandwidth (56 kbps) than the average citizen can connect to the Internet in their home with a telephone line.

The dedication of the 4.9 GHz band to public safety applications would increase the speed and bandwidth from anywhere to 1.5 MB (Megabits) to 11 MB, which is comparable to the speeds and bandwidth of a wired (fiber) network. The information provided is based on the current technologies available for broadband that our Information Technologies Bureau has researched. The 4.9 GHz band would allow public safety agencies to download a mug photo in a matter of seconds, instead of 1 to 5 minutes it currently takes. This would allow an officer in the field to upload a crime incident report in seconds, instead of minutes. This would allow an officer in the field to actually do some crime analysis and mapping, which currently cannot be done wirelessly because of speed and bandwidth restrictions of a 19.2 kbps limitation.

It is worth noting that our agency is about to enter a pilot test with Enterasys (formerly known as Cabletron) for a broadband wireless solution to connect one of our 16 satellite offices, that cannot be connected by fiber to our network due to cost restrictions. Fiber connections to our network in our market area averages about \$5.00 per foot.

The Memphis Police Department is committed to COPS (Community Oriented Policing System). The most significant deficiency that we have in our COPS program is our inability to share data/information with our satellite COPS offices because we cannot afford fiber connections to our network for most of these locations. This means that data and information has to be shared via telephone, fax or in person to these satellite locations. The 4.9 GHz band dedication to public safety would allow us to very cost effectively network all our satellite locations for the sharing of data information, and the vast resources of public safety applications that we have available on our wide area network.

Please note the following drawbacks to using wireless broadband technology, as provided by Enterasys. We will operate on a spectrum that is unlicensed and not dedicated to us (public safety) for our mission critical applications. We will have no dedicated priority access, no guaranteed coverage or reliability within this unlicensed bandwidth. While this company currently offers encryption for the security of our data that is adequate, emerging technologies suggests that this will be inadequate within a one to two year period.

Furthermore, our local partnerships with technology companies in the Memphis area has advised us that companies such as, WorldCom, Ricochet, Verizon, etc., have planned and are going to flood metro areas, including Memphis, within the next year with broadband wireless Internet access that uses this spectrum. The assumptions for disaster this will produce for public safety in this area are described in the previous paragraph and in this letter.

Public safety and welfare, as well as the future of high-speed wireless technologies and applications for public safety, will most assuredly be given priority in any decision made by the FCC related to this concern. The City of Memphis Police Department urges you and the

Commission to recognize our broadband spectrum needs and allocate this much-needed 4.9 GHz band to the public safety community. Obtaining this spectrum is a critical step for public safety agencies, such as ours, to access and advance forward our broadband solutions for mission critical applications.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter E. Crews", with a stylized flourish at the end.

Walter E. Crews
Director of Police Services
City of Memphis, Tennessee

wrd/WEC

cc: Office of the Secretary
Ms. Magalie Roman Sallas
445 12th Street, SW
Washington, DC 20554